Done

☐ Urgent Due Date: _____

Revised 12/15/11
Electronic 08/22/14

WATER DIVISION CONCURRENCE SHEET

For WECA Enforcement Correspondence

PERMITTEE/FACILITY: Ex. 6. Farms

LOCATION: Norris City, IL PERMIT #: NA

SUBJECT/RECOMMENDED ACTION: Compliance Evaluation Inspection Report

Check the appropriate boxes to indicate who this document should be routed to.

		NAME	INITIALS	DATE	STATE CONTACT
☑	WECA Staff	Rogers	JR	9/2/2014	
☑	APA	Tracy Jamison	JJ	9/2/14	
☑	Section Chief	Bahr	[illegible]	9/2/14	
☐	State Filter Call (If required)*	(----------)	____	_____	_____
☐	Branch Chief	Dean Maraldo	____	_____	
☐	Division APA	Jessie Ortiz	____	_____	
☐	Deputy Director	(	____	_____	
☐	Division Director	Tinka G. Hyde	____	_____	

OFFICE OF REGIONAL COUNSEL

☐	Attorney	( )	____	_____
☐	Section Chief	( )	____	_____
☐	Branch Chief	( )	____	_____
☐	Deputy Regional Counsel	( )	____	_____
☐	Regional Counsel	( )	____	_____
☐	Other	( )	____	_____

OFFICE OF REGIONAL ADMINISTRATOR

☐	Deputy Regional Administrator	( )	____	_____
☐	Regional Administrator	( )	____	_____

Other

☐		( )	____	_____
☐		( )	____	_____

☐ Return for Mailing to(Name):

☐ **Return to Staff (Name):** **Location:**

FILE LOCATION

G:\WECA\

Note:

*Per WECA & OECA Standard Operating Procedures, States and Tribes must be notified prior to issuing the following actions: 308s, AOs, APOs. The name of the person notified must be recorded above. These documents may not be transmitted unless notification has been documented.

Date Mailed _____ Mailed by _____ (initials)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 2 2014

REPLY TO THE ATTENTION OF:
WC-15J

CERTIFIED MAIL 7009 1680 0000 7675 2060
RETURN RECEIPT REQUESTED

Ex. 6 (Personal Privacy)

Owner, Ex. 6. Farms
Ex. 6 (Personal Privacy)

Subject: August 7, 2014 Compliance Evaluation Inspection

Dear Mr. Ex. 6.:

Enclosed, please find a copy of the U.S. Environmental Protection Agency Inspection Report for the Concentrated Animal Feeding Operation inspection conducted at Ex. 6 (Personal Privacy) Farms on August 7, 2014. The purpose of the inspection was to evaluate and document compliance of Ex. 6. Farms with the Clean Water Act.

Should you find anything in the report that you disagree with, please provide a detailed response within thirty (30) calendar days.

Thank you for your prompt attention to this matter. If you have any questions, please contact Joan Rogers of my staff at (312) 886-2785.

Sincerely,

Ryan J. Bahr, Chief, Section 2
Water Enforcement and Compliance Assurance Branch

Enclosures

cc: Joe Stitely, IEPA
Bud Bridgewater, IEPA
Bruce Rodely, IEPA
Brian Rodely, IEPA

CWA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5

Purpose:
Compliance Evaluation Inspection

Facility:
Ex. 6 (Personal Privacy) Farms
Ex. 6 (Personal Privacy)

NPDES Permit Number:
N/A

Date of Inspection:
August 7, 2014

EPA Representatives:

Joan Rogers, Environmental Scientist Rogers.joan@epa.gov	312-886-2785
Ben Atkinson, Agronomist Atkinson.ben@epa.gov	312-353-8243

State Representatives:

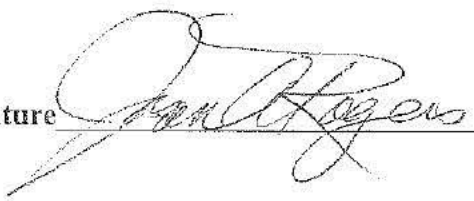
Bruce Rodely, Environmental Protection Engineer	618-993-7200
Brian Rodely, Environmental Protection Engineer	618-993-7200

Facility Representatives:

Ex. 6 (Personal Privacy) Owner	Ex. 6 (Personal Privacy)

Report Prepared by:
Joan Rogers, Environmental Scientist

Report Date:
August 11, 2014

Inspector Signature 

1. BACKGROUND

The purpose of this report is to describe, evaluate and document [redacted] Farm's compliance with the Clean Water Act (CWA) at its Norris City, Illinois facility on August 7, 2014. This inspection was performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended.

[redacted] Farms was previously a medium swine animal feeding operation (AFO). During an inspection on February 20, 2014, representatives from Illinois Environmental Protection Agency (IEPA) inspected the facility. There were 1600 hogs greater than 55 pounds on site. The IEPA inspector observed a discharge of manure and process wastewater to a surface water body. IEPA representatives took samples and on March 20, 2014 issued Violation Notice W-2014-50029 (VN) to the owners of [redacted] arms. The VN instructed the owner to pump down and maintain at least two feet of freeboard in the manure ponds, collect all liquid runoff from the mortality composting area, begin keeping records, re-grade and reshape manure pond berms, and repair or replace the depth markers in the manure ponds. The VN also required at least one person become certified as a livestock facility manager and the facility owners apply for a National Pollutant Discharge Elimination System (NPDES) Permit.

Since the discharge of manure and process wastewater was through a man-made device, the facility is a Concentrated Animal Feeding Operation (CAFO). U.S. EPA inspected the facility to determine compliance with the VN and with the CWA.

Upon arriving at the facility, the owner stated that he intended to go out of business. The last hogs were shipped off site in March 2014. The owner does not intend to repopulate the facility ever again and has been in contact with the Illinois Department of Agriculture for guidance on closing out the manure ponds. Since the facility has had hogs for at least 45 days in the previous 12 months, the facility is still a CAFO.

The owner also has been working with IEPA to comply with the requirements of the VN. He has provided reports and has contacted Mr. Chris West of Frank and West Environmental Engineers initially to develop a Comprehensive Nutrient Management Plan (CNMP) and now to help with the closure of the facility.

Surface flow off the facility is to the west and south. A storm water channel at the west side of the facility allows flow to access a culvert and then flows to a storm water ditch at the western edge of the production area. The flow in the ditch is to the south and then west 0.2 miles to an intermittent unnamed tributary of Indian Creek. The intermittent unnamed tributary flows 0.12 miles to Indian Creek which in turn flows another 3.6 miles to Bear Creek. Bear Creek flows 7.1 miles to Cane Creek and then 2.6 miles to the North Fork Saline River. The North Fork Saline River flows 15 miles to Saline River and Saline River flows 17 miles to the Ohio River. The Ohio River is a Traditional Navigable Water (TNW). Cane Creek is listed on the 2004 303d list impaired for habitat alterations and nutrients.

2. SITE INSPECTION

Table 1: Site Entry

Arrival Time:	10:50 A.M.
Temperature:	85°F
Precipitation:	Approximately 0.5" the night before
Presented credentials?	Yes
Credentials presented to whom?	Owner
EPA vehicle parked in approved location?	Yes
Location where EPA vehicle was parked?	By the shed
Disposable boots worn?	Yes
Other bio-security measures taken:	Vehicle washed at 8:45A.M.

2.1 Records Review (The following Records Review tables reflect information provided before the walk-through of the facility, unless otherwise noted.)

Table 2: Documents

Checklist(s) Used	
R5 CAFO Boilerplate Inspection Report created using the R5 CAFO Inspection Checklist	
Facility Documents Reviewed:	
None	
If photographs or documents were taken, does the facility consider any to be Confidential Business Information (CBI)?	No

Table 3: Facility Description

Type of Animal	Number of Animals	Capacity	Type of Confinement
Swine	None	2500	Confinement Barn
Minimum Number of Animals in previous 5 years:			None
Maximum Number of Animals in previous 5 years:			2500
Number of Animals that are stabled/confined and/or fed/maintained for 45 days or more in previous 12 months:			1600 were on site until approximately March 7, 2014
Amount of Manure Generated per year:			Unknown
(Illinois Only) Name of Certified Livestock Manager for facility: **(if 300 animal units or greater):**			None
Does the facility have an NPDES Permit?			No
SIC or NAICS code:			0213
Other facilities under common ownership (name and address): None			

Table 4: Livestock Waste Storage

Type of Storage	Storage Capacity	Type of Liner	Depth Markers Present	Last Time Waste was Removed	Amount of Waste Removed	Days of Storage
Barns 7 & 8 – Shallow Pit/Pull Plug	Pits are 2' deep. Unknown capacity.	Concrete	No	Unknown	Unknown	Unknown
Barn 2 – Deep Pit	Pit is 6' deep. Unknown capacity.	Concrete	No	Unknown	Unknown	Unknown
Barn 3 – Flush Gutter	Unknown	Concrete	No	Unknown	Unknown	Unknown
Barn 4 – Flush Gutter under slats	Unknown	Concrete	No	Unknown	Unknown	Unknown
(5) Manure Storage Ponds	Unknown	Clay	Yes	August 6, 2014	Unknown	Unknown
Records at site of storage structure design?				No		
Additional Information:				Facility was built in the 1970's. Current owner has owned site since 2000.		

Table 5: Livestock Waste Management

Describe the way manure is collected and disposed of at the facility:
From Barns 7 & 8, manure flows to the first cell of the two cell pond system via gravity from shallow pits that are opened with a pull plug. From Barns 2 & 3, manure flows to the first cell of the three cell pond system via gravity from flush gutter systems. Manure is pumped directly from the deep pit of Barn 4 for direct land application. Manure from the manure ponds is land applied two times per year.
Describe the way used bedding is collected and disposed of at the facility:
No bedding is used.
Describe the way mortalities are managed at the facility:
Mortalities are composted on site with sawdust.
Describe the way spilled drinking water is collected and disposed of at the facility:
Spilled drinking water is handled with the manure.
Describe the way mist cooling water is collected and disposed of at the facility:
No mist cooling is used.

Describe how chemicals are stored and how used or spilled chemicals are collected and disposed of at the facility:
No chemicals are on site.
Describe the way water that has been used to wash/flush barns is collected and disposed of at the facility:
Wash water flows to manure ponds and is handled with the manure.
Describe the way feed is contained and how runoff from feed is collected and disposed of at the facility:
Feed is contained in bulk bins and spilled feed is cleaned up.

Table 6: Land Application and Disposal of Manure and Process Wastewater

When was the last time a sample was taken of the manure and/or process wastewater?	"Eons ago". None recently
Number of acres available for land application:	8,000 - 10,000 acres
Are land application records kept?	Yes
Is manure transferred off-site to another party?	No
Are manure transfer records maintained?	N/A

Table 7: Receiving Surface Waters

Describe the surface flow pathways:	
Surface flow off the facility is to the west and south. A storm water channel at the west side of the facility allows flow to access a culvert and then flows to a storm water ditch at the western edge of the production area. The flow in the ditch is to the south and then west 0.2 miles to an intermittent unnamed tributary of Indian Creek. The intermittent unnamed tributary flows 0.12 miles to Indian Creek which in turn flows another 3.6 miles to Bear Creek. Bear Creek flows 7.1 miles to Cane Creek and then 2.6 miles to the North Fork Saline River. The North Fork Saline River flows 15 miles to Saline River and Saline River flows 17 miles to the Ohio River. The Ohio River is a Traditional Navigable Water (TNW). Cane Creek is listed on the 2004 303d list impaired for habitat alterations and nutrients.	
How many months out of the year is there flow in the nearest surface water pathway:	Indian Creek is flowing most of the year, but the intermittent tributary only flows during precipitation events.
Are there any storm water pathways entering the facility?	No
Are there any clean water ponds on site?	Yes
What is the name of the first Traditional Navigable Water (TNW) for surface flow from the facility?	Indian Creek
Is the surface water pathway nearest to the facility considered to be ephemeral, intermittent or perennial?	Intermittent

Is the surface water pathway nearest to the facility considered to be impaired?	No

Table 8: Nutrient Management Plan

NMP on site?	Although NMP's had been prepared when the facility grew hogs for different suppliers, those NMP's were developed by the contracting company and were never on site.

Table 9: Land Application Records

No land application records were available for review.

Table 10: Facility Records

No facility records were available for review. Owner stated that when he grew hogs for Cargill, they sent representatives one time per month for a site inspection. They kept records of the inspections.

2.2 Walkthrough of the Facility

After completing the checklist while standing near the parked vehicles by the Hay Barn, EPA walked west and basically clockwise around the facility buildings. (See Attachment A – Aerial Map of Facility.) EPA walked along the north side of Barns 7 & 8, then along the southern and western side of the two cell manure ponds for these barns.

At the east end of Barn 7, EPA observed some spilled feed below the bulk bin for this barn and eroded ground at the end of the barn whereby storm water could enter the pit. EPA discussed both of these issues with the owner. The addition of storm water in the pit would be additional water to the manure ponds and lessen the capacity in them.

At the west end of Barn 8, EPA observed an open pipe in a hole. The owner explained that the hole was dug and the pipe exposed in order to unclog the manure line from the barns. The open pipe also would allow additional storm water to enter the manure ponds and the owner was advised to cap the pipe.

The two cell manure ponds for these barns had approximately two feet of freeboard as indicated by the staff gauge in Pond #2. The vegetation was well maintained and there was no woody growth in the berms of either pond. During the IEPA inspection in February 2014, Pond #2 was overflowing and discharging. During this inspection, the manure pond was not discharging.

1: IMGP1221
Description: East end of Barn 7.
Location: East of Barn 7
Camera Direction: South
Date/Time: August 7, 2014 10:51 A.M.

2: IMGP1222
Description: Barns 7 & 8 are located under one roof. Barn 7 is the east half and Barn 8 is the west half of the building. These barns utilize a shallow pit/pull plug system.
Location: East side of Barn 7
Camera Direction: Southwest
Date/Time: August 7, 2014 10:52 A.M.

3: IMGP1223
Description: Some feed spilled below the bulk bin on the east side of Barn 7.
Location: East side of Barn 7
Camera Direction: South
Date/Time: August 7, 2014 10:53 A.M.

4: IMGP1224
Description: Storm water can enter the barn's pit from the eroded area on the east side of Barn 7.
Location: East side of Barn 7
Camera Direction: Down
Date/Time: August 7, 2014 10:54 A.M.

5: IMGP1225
Description: Pond #2 for Barns 7 & 8 has approximately two feet of freeboard.
Location: West side of Barn 7
Camera Direction: West
Date/Time: August 7, 2014 10:55 A.M.

6: IMGP1226
Description: Vegetation is kept mowed around Pond #1 for Barns 7 & 8. Manure and process wastewater from Barns 7 & 8 flow via gravity to Pond #1.
Location: West of Barn 8.
Camera Direction:
Date/Time: August 7, 2014 10:56 A.M.

7: IMGP1227
Description: No feed spilled under the bulk bin for Barn 8.
Location: West side of Barn 8
Camera Direction: Northeast
Date/Time: August 7, 2014 10:56 A.M.

8: IMGP1228
Description: Storm water can access an open pipe west of Barn 8 and flow to Pond #1.
Location: West side of Barn 8
Camera Direction: Down
Date/Time: August 7, 2014 10:57 A.M.

9: IMGP1229
Description: South side of Barns 7 & 8.
Location: West of Barn 8
Camera Direction: Northeast
Date/Time: August 7, 2014 10:58 A.M.

10: IMGP1230
Description: Overflow pipe from Pond #1 to Pond #2 for Barns 7 & 8 and staff gauge in Pond #2.
Location: East of Pond #1 for Barns 7 & 8
Camera Direction: West
Date/Time: August 7, 2014 10:59 A.M.

11: IMGP1231
Description: West side of Pond #1 for Barns 7 & 8.
Location: Southwest corner of Pond #1 for Barns 7 & 8
Camera Direction: Northwest
Date/Time: August 7, 2014 11:00 A.M.

12: IMGP1232
Description: West side of Pond #2 for Barns 7 & 8. Vegetation is mowed and no woody growth. Also the location of an observed discharge by IEPA on February 20, 2014.
Location: West side of Pond #2
Camera Direction: North
Date/Time: August 7, 2014 11:03 A.M.

North of Pond #2 for Barns 7 & 8, EPA observed a channel that would transport storm water to the west and to a storm water ditch. The channel had a culvert that assisted the flow from east to west. The storm water ditch to the west flowed to the south. During the IEPA inspection in February 2014, a discharge of manure and process wastewater from the pit below Barn 2 flowed into this channel and then to the storm water ditch. On the day of this inspection, there was no manure or process wastewater entering the storm water channel.

13: IMGP1233
Description: Storm water channel between barns transports flow to a storm water ditch on the west side of the facility. Barn 2 is in background.
Location: North of Pond #2 for Barns 7 & 8
Camera Direction: North
Date/Time: August 7, 2014 11:03 A.M.

14: IMGP1234
Description: A culvert under the berm carries storm water to the west to a ditch.
Location: North of Pond #2 for Barns 7 & 8
Camera Direction: West
Date/Time: August 7, 2014 11:04 A.M.

EPA walked north to observe Barns 2, 3 and 4 and the three cell manure pond system for these barns. The clean out holes for Barn 2's deep pit was at ground level and storm water could enter the pit from the holes. During IEPA's February 2014 inspection, the pit was discharging out of the holes. During this inspection, EPA noted from inside the barn that there was four feet of freeboard in the pit.

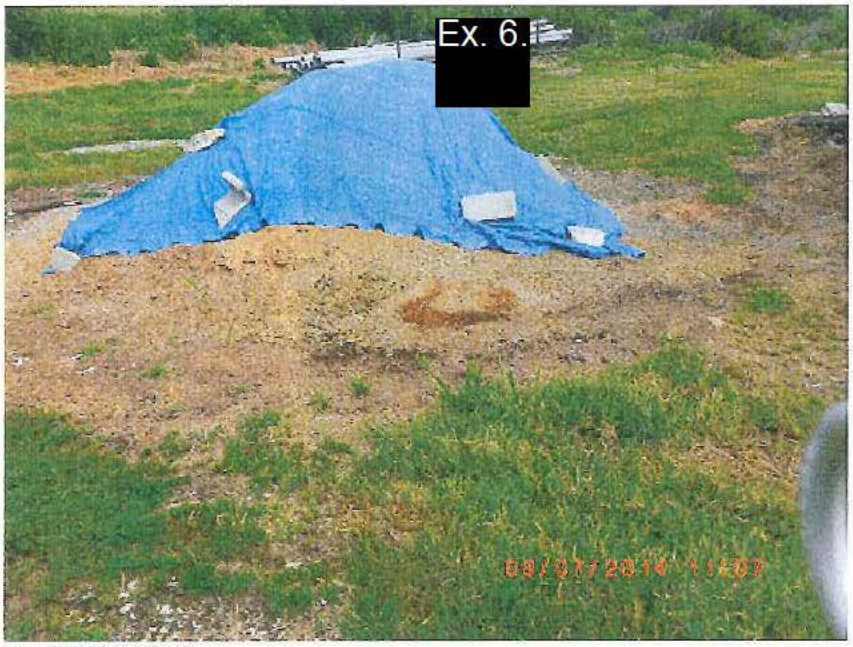
EPA walked north along the west side of the barns and on the east side of the manure ponds. The Compost Building was located west of Barn 3. During the IEPA's February 2014 inspection, there was runoff from this area from the mortalities and sawdust pile. During this inspection, EPA observed that the mortalities had been removed and the sawdust pile had been covered although not completely. The two concrete channels on the compost pad were still filled with compost material that needed to be land applied. The roof structure did not completely cover the concrete pad and there was still the potential for precipitation to come in contact with compost material and run off. EPA noted bones from mortalities laying around in the yard by the Compost Building.

Then EPA walked along the north and west berms of the three manure ponds. The vegetation was very high and there was woody growth growing out of the berms. The berms were very steep on the north and west sides. During the IEPA's February 2014 inspection, Pond #1 was overflowing at the northern side. The owner has since built up that side of the berm. There was approximately 1.5 feet of freeboard in Pond #1 as indicated by a staff gauge in that pond.

15: IMGP1235
Description: Clean out holes for Barn 2's deep pits are at ground level. Also the location of a discharge observed by IEPA on February 20, 2014.
Location: South side of Barn 2
Camera Direction: North and down
Date/Time: August 7, 2014 11:05 A.M.

16: IMGP1236
Description: South side of Barn 2.
Location: Southwest corner of Barn 2
Camera Direction: East
Date/Time: August 7, 2014 11:06 A.M.

17: IMGP1237
Description: Level of manure in Barn 2's pit was approximately four feet.
Location: Inside Barn 2
Camera Direction: Down
Date/Time: August 7, 2014 11:06 A.M.



18: IMGP1238
Description: Sawdust pile is not completely covered.
Location: West of Barn 3
Camera Direction: North
Date/Time: August 7, 2014 11:07 A.M.

19: IMGP1239
Description: Compost Building is not completely covered. Mortalities have been removed, but concrete channels on either side still have compost that needs to be land applied.
Location: West of Barn 3
Camera Direction: North
Date/Time: August 7, 2014 11:07 A.M.

20: IMGP1240
Description: Compost Building is not completely cleaned out.
Location: West of Barn 3
Camera Direction: South
Date/Time: August 7, 2014 11:10 A.M.

21: IMGP1241
Description: Some bones from scavenged mortalities are laying around in the yard.
Location: West of Barn 3
Camera Direction: Down
Date/Time: August 7, 2014 11:10 A.M.

22: IMGP1242
Description: East side of Barn 3 and Barn 2 in background.
Location: North side of Barn 3
Camera Direction: South
Date/Time: August 7, 2014 11:10 A.M.

23: IMGP1243
Description: Barn 4 utilizes a flush gutter system under slats.
Location: Northwest corner of Barn 4
Camera Direction: Southeast
Date/Time: August 7, 2014 11:11 A.M.

24: IMGP1244
Description: Barn 4
Location: Northwest corner of Barn 4
Camera Direction: Northeast
Date/Time: August 7, 2014 11:11 A.M.

25: IMGP1245
Description: Pond #1 for Barns 2, 3, and 4 has a lot of tall vegetation and woody growth on the berms.
Location: North of Barn 4
Camera Direction: West
Date/Time: August 7, 2014 11:11 A.M.

26: IMGP1246
Description: North side of Barn 4.
Location: North of Barn 4
Camera Direction: South
Date/Time: August 7, 2014 11:12 A.M.

27: IMGP1247
Description: Pond #1 for Barns 2, 3, and 4 has about 1.5 feet of freeboard.
Location: East side of Pond #1
Camera Direction: Southwest
Date/Time: August 7, 2014 11:13 A.M.

28: IMGP1248
Description: Pond #1 overflows into Pond #2 through channel in berm wall.
Location: North side of Pond #1 for Barns 2, 3, and 4
Camera Direction: South
Date/Time: August 7, 2014 11:15 A.M.

29: IMGP1249
Description: Depth marker for Pond #1 indicates approximately 1.5 feet of freeboard.
Location: North side of Pond #1 for Barns 2, 3, and 4
Camera Direction: Down
Date/Time: August 7, 2014 11:15 A.M.

30: IMGP1250
Description: Pond #2 overflows into Pond #3 to the south.
Location: Northwest corner of Pond #2
Camera Direction: South
Date/Time: August 7, 2014 11:18 A.M.

31: IMGP1251
Description: Ponds #2 and #3 need to have the vegetation mowed on the berms and need to have the woody growth removed.
Location: West side of Pond #2 for Barns 2, 3, and 4
Camera Direction: South
Date/Time: August 7, 2014

A staff gauge in Pond #3 indicated that there was approximately 2.5 feet of freeboard in that pond.

32: IMGP1252
Description: Staff gauge in Pond #3 indicates that there is approximately 2.5 feet of freeboard.
Location: West side of Pond #3
Camera Direction: Southeast
Date/Time: August 7, 2014 11:20 A.M.

At the southeast corner of Pond #3 stormwater from the north is diverted away from the pond and to the storm water channel in the yard to the south. A culvert assists the flow to go to the south.

33: IMGP1253
Description: Culvert pipe for storm water that collects on the southeast side of Pond #3 transports the flow to the storm water channel to the south.
Location: Southeast corner of Pond #3
Camera Direction: Northwest
Date/Time: August 7, 2014 11:22 A.M.

34: IMGP1254
Description: Utility barns and feed storage.
Location: East of feed storage area
Camera Direction: Northwest
Date/Time: August 7, 2014 11:25 A.M.

EPA concluded the walk-through of the facility at approximately 11:30 A.M. and gave the owner a closing conference. EPA did not observe any potential violations but did observe a few areas of concern. The owner requested that the facility operator join the conversation so as to hear the areas that needed attention. The facility operator agreed to address these areas within the week.

Although the facility owner stated that he intended to go out of business, EPA gave him compliance assistance materials in case any of the information was helpful to him. EPA left their disposable boots on site and exited the facility at approximately 12 Noon.

2.3 Closing Conference and Post-Inspection

Table 11: Post Walk-Through

Were specific "Potential Violations" discussed with facility personnel?	None were observed
Were specific "Areas of Concern" discussed with facility personnel?	Yes
Compliance assistance materials given to facility personnel:	
EQIP Brochure from US Department of Agriculture NRCS	
IEPA Tax Certification Program for Livestock Waste Management Facilities	
U.S. EPA Small Business Resources Information Sheet	
U.S. EPA Concentrated Animal Feeding Operations Final Rulemaking – Fact Sheet	
Exit Time:	12:00 Noon
Disposable Boots Left at Facility?	Yes
Vehicle Washed after leaving facility?	Yes
Date and Time that vehicle was washed:	8/7/14 at 6:30 P.M.

Table 12a: Sampling Information

Were samples taken?	No

3. POTENTIAL VIOLATIONS

EPA did not observe any potential violations on the day of the inspection.

4. AREAS OF CONCERN

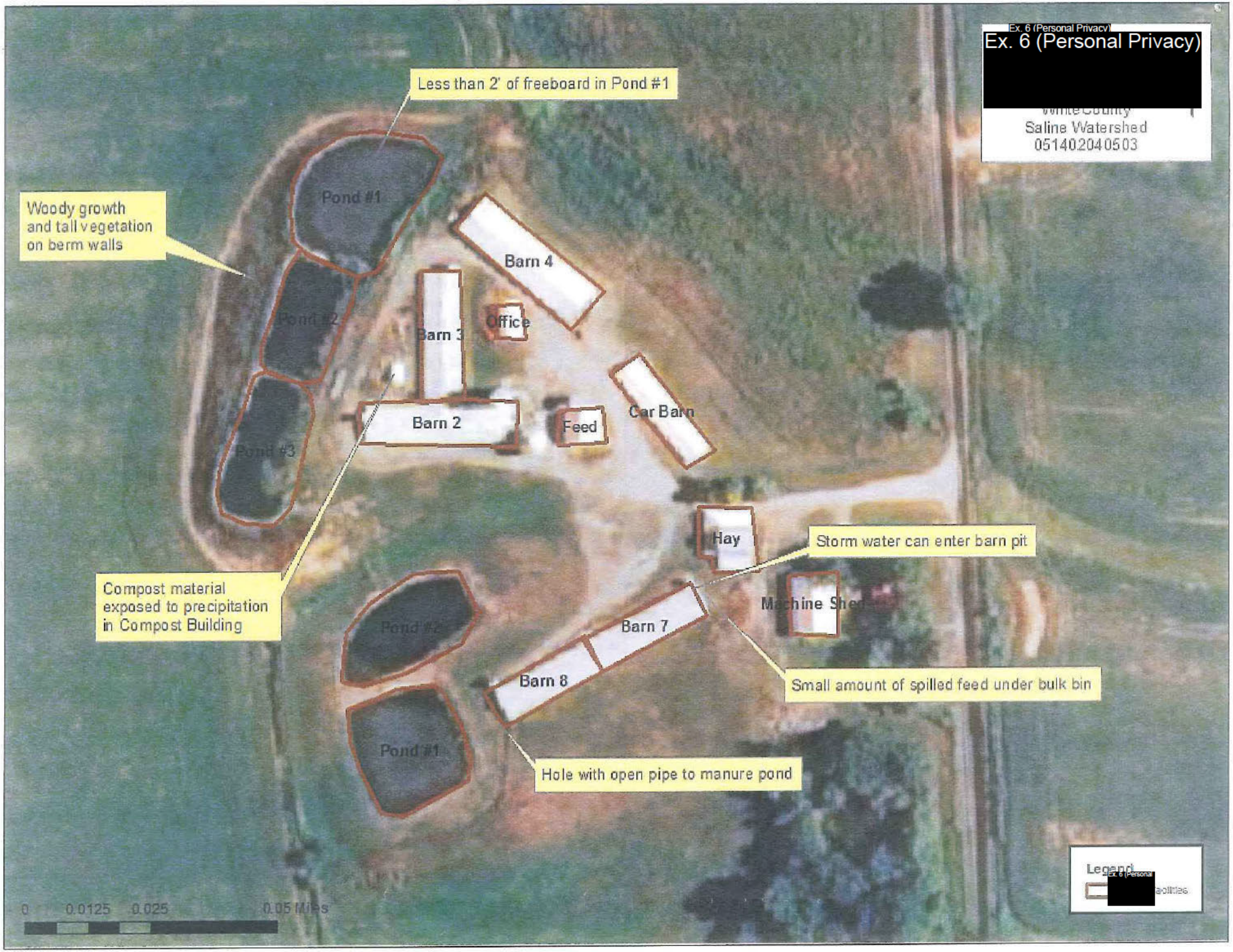
EPA observed these areas of concern whereby pollutants have the potential to reach waters of the United States:

1. Storm water can enter the under barn pits of Barn 7 & 8 and thereby diminish the capacity of the manure ponds.
2. Feed under the bulk bin on the east side of Barn 7 needed to be removed.
3. Open pipe on the west side of Barn 8 allowed storm water to enter the manure storage pond and would diminish the capacity of the manure ponds.
4. Compost material in the Compost Building needed to be removed and land applied. The saw dust pile needed to be covered completely or stored under roof.

5. Woody growth needed to be removed from the three cell manure storage ponds.
6. Tall vegetation needed to be mowed on the three cell manure storage ponds.
7. Needed to remove more liquid from three cell manure ponds system to get down to the two feet of freeboard as required by the VN.

5. LIST OF ATTACHMENTS

A) Aerial photograph of [redacted] Farms with buildings and concern areas labeled.


Ex. 6 (Personal Privacy)
Ex. 6 (Personal Privacy)
Saline Watershed
05140204050 3
Less than 2' of freeboard in Pond #1
Woody growth and tall vegetation on berm walls
Pond #1
Pond #2
Pond #3
Barn 4
Barn 3
Office
Barn 2
Feed
Car Barn
Hay
Storm water can enter barn pit
Compost material exposed to precipitation in Compost Building
Pond #2
Barn 7
Barn 8
Pond #1
Small amount of spilled feed under bulk bin
Hole with open pipe to manure pond
Legend
0 0.0125 0.025 0.05 Miles